

**STATEMENT OF GINGER SWARTZ ON BEHALF OF
THE STATE OF NEVADA AGENCY FOR NUCLEAR PROJECTS
REGARDING THE U.S. DEPARTMENT OF ENERGY'S
DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR A GEOLOGIC
REPOSITORY FOR THE DISPOSAL OF SPENT NUCLEAR FUEL
AND HIGH-LEVEL RADIOACTIVE WASTE AT
YUCCA MOUNTAIN, NEVADA**

EIS000269

**PRESENTED AT THE PUBLIC HEARING IN
DENVER, COLORADO
NOVEMBER 16, 1999**

RECEIVED

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In order for people to participate in the National Environmental Policy Act (NEPA) process, they must first be afforded the opportunity to know that a major federal action has the potential to impact them and their communities. While the U.S. Department of Energy (DOE) is conducting public hearings in various communities in Nevada and around the country, DOE has made no effort to inform citizens and public officials of the relevance of the draft Environmental Impact Statement (EIS) to them and their states and communities.

1 [The notices for this public hearing, for example, refer only to a draft EIS for a radioactive waste repository at Yucca Mountain, Nevada. They do NOT indicate that people in the Denver metropolitan area, other parts of Colorado, Wyoming, and other western states stand to be significantly impacted by thousands of radioactive materials shipments as a direct result of the Yucca Mountain program.

One can only conclude that such an oversight is intentional and designed to suppress public interest in the project and participation in these public hearings.]

2 [Nevada believes that DOE has violated NEPA by concealing crucial information used in the draft EIS. Absent this information, persons affected by the transportation impacts of the proposed action have no way of determining the substantive and legal sufficiency of DOE's analysis. Such concealment of crucial information can only diminish public confidence in DOE's ability to safely transport these highly radioactive materials.]

3 [DOE contractors who prepared the draft EIS actually selected specific routes for analysis using the HIGHWAY and INTERLINE models. A draft EIS reference [TRW, Environmental Baseline File for National Transportation, with Data Files (June, 1999), Chapter 4] even describes the procedures followed. However, DOE decided not to reveal the actual highway and rail routes used in the draft document, and the TRW reference does not provide a written summary or maps of the information provided to DOE on computer files.

The State of Nevada has sponsored a number of routing studies over the past decade using the same computer models as DOE's consultants. A 1994 study prepared by the University of Nevada, Las Vegas Transportation Research Center, indicates that if Nevada does not designate preferred alternative routes and DOE shipping contractors follow the quickest routes consistent with federal regulations, the primary east-west highway corridors would be I-80 from Ohio to Utah, I-70 from Pennsylvania to Utah, and I-15 from Utah to Nevada.

Using the shipment numbers in the draft EIS and highway routing studies prepared by the UNLV Transportation Research Center, the State of Nevada has developed a preliminary estimate of potential legal-weight truck shipments through Colorado and Wyoming to Nevada. Table 1 shows potential truck shipments of SNF and HLW through Colorado and Denver on I-70. Under the mostly truck scenario, there would be about 35,350 shipments through Denver over 39 years. Put another way, there would be an average of 2.5 truck shipments per day on I-70 through Denver every day, seven days a week, for as many as 39 years.

Table 2 shows potential truck shipments of SNF and HLW through Wyoming on I-80. Under the mostly truck scenario, there would be about 27,600 shipments through Wyoming over 39 years. That would mean an average of almost two truck shipments per day through Wyoming on I-80, every day, seven days a week, for 39 years.

4 [The draft EIS fails to evaluate the most likely, and potentially heaviest impact, modal mix (i.e., rail/truck/barge) scenario for civilian SNF shipments. The draft EIS mostly rail scenario significantly misrepresents the extent to which legal-weight truck (LWT) shipments to the repository can be reduced by unrealistically assuming major investments at reactor sites and unprecedented and likely infeasible use of heavy haul truck (HHT) and barge transport.

Nevada believes that the final EIS must evaluate a transportation scenario based on the current transportation capabilities of reactor and storage sites. Planning Information Corporation of Denver (PIC) developed a current capabilities transportation scenario for the State of Nevada in September, 1996. Under the PIC current capabilities scenario, 32 reactor and storage sites in 19 states ship civilian spent nuclear fuel (SNF) to the repository by legal-weight truck. These 32 sites account for about 35 percent of the total civilian SNF inventory shipped to the repository.

Using the shipment numbers in the draft EIS and the PIC mode and route assumptions, the State of Nevada has developed a preliminary estimate of shipments under the current capabilities scenario. Table 3 indicates there would be almost 9,100 rail shipments through Colorado and Wyoming over 39 years, an average of about 4.5 cask-shipments per week, every week, for 39 years. Almost all of the rail shipments would follow the Union Pacific mainline from Gibbon, Nebraska to Salt Lake City through northeastern Colorado and southern Wyoming. Shipments from at least one reactor in Illinois would use the former Southern Pacific route through Grand Junction.

There would also be a considerable number of legal weight truck shipments through Colorado and Wyoming under the current capabilities scenario. Table 4 shows there would be about 12,660 truck shipments through Colorado on I-70, an average of 6.2 shipments per week, every week, for 39 years. Table 5 shows there would be about 11,345 truck shipments through Wyoming on I-80, an average of 5.6 shipments per week; every week, for 39 years.

PIC combined the current capabilities modal assumptions with the most likely highway and rail routes, using the same HIGHWAY and INTERLINE computer models employed by DOE. A map showing these routes is attached as Figure 1.

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The State of Nevada will be submitting extensive written comments on this Draft Environmental Impact Statement for a high-level nuclear waste repository at Yucca Mountain. It is our hope that these comments and those of all others will be seriously considered, and that a reasonable No Action alternative (as opposed to the unreasonable and unrealistic ones contained in the draft document) is selected as the preferred action in the Final Environmental Impact Statement.

TABLE 1			
YMDEIS TRANSPORTATION IMPACTS			
MAXIMUM SHIPMENTS THROUGH COLORADO ON I-70			
NATIONAL MOSTLY TRUCK SCENARIO, DOE MODULE 2			
NEVADA BASE CASE ROUTING			
Browns Ferry(AL)		2067	
DOE Fort St. Vrain(CO)		334	
Crystal River(FL)		442	
St. Lucie(FL)		1086	
Turkey Point(FL)		871	
Hatch(GA)		1334	
Vogtle(GA)		1462	
Wolf Creek(KS)		708	
Calvert Cliffs(MD)		1,140	
Callaway(MO)		735	
Brunswick(NC)		903	
Harris(NC)		921	
McGuire(NC)		1464	
Oyster Creek(NJ)		519	
Salem/Hope Creek(NJ)		1992	
Limerick(PA)		1722	
Peach Bottom(PA)		1408	
Three Mile Island(PA)		435	
Catawba(SC)		1,330	
Oconee(SC)		1500	
Robinson(SC)		306	
Summer(SC)		538	
DOE-Savannah River(SC)		8131	
Sequoyah(TN)		1179	
Watts Bar(TN)		840	
North Anna(VA)		1079	
Surry (VA)		902	
Corridor Subtotal		35348	

TABLE 2			
YMDEIS TRANSPORTATION IMPACTS			
MAXIMUM SHIPMENTS THROUGH WYOMING ON I-80			
NATIONAL MOSTLY TRUCK SCENARIO, DOE MODULE 2			
NEVADA BASE CASE ROUTING			
Haddam Neck(CT)		255	
Millstone(CT)		1669	
Arnold(IA)		420	
Braidwood(IL)		1494	
Byron(IL)		1444	
Clinton(IL)		690	
Dresden/Morris(IL)		1569	
La Salle(IL)		1261	
Quad Cities(IL)		1123	
Zion(IL)		1028	
Pilgrim(MA)		476	
Yankee-Rowe(MA)		134	
Calvert Cliffs(MD)		1140	
Maine Yankee(ME)		356	
Big Rock Point(MI)		131	
Cook(MI)		1235	
Fermi(MI)		764	
Palisades(MI)		454	
Monticello(MN)		342	
Prairie Island(MN)		805	
Cooper(NE)		454	
Fort Calhoun(NE)		362	
Seabrook(NH)		630	
Fitzpatrick/Nine Mile(NY)		1971	
Ginna(NY)		379	
Indian Point(NY)		1155	
DOE West Valley(NY)		300	
Davis-Besse(OH)		535	
Perry(OH)		631	
Beaver Valley(PA)		1156	
Susquehanna(PA)		1582	
Vt Yankee(VT)		484	
Kewaunee(WI)		401	
LaCrosse(WI)		37	
Point Beach(WI)		742	
Corridor Subtotal		27609	

TABLE 3			
YMDEIS TRANSPORTATION IMPACTS			
RAIL SHIPMENTS THROUGH COLORADO AND WYOMING			
NEVADA CURRENT CAPABILITIES SCENARIO, DOE MODULE 2			
NEVADA BASE CASE ROUTING			
COLORADO: UNION PACIFIC(SP) From Colorado			
Fort ST. Vrain		38	
COLORADO: UNION PACIFIC(SP) From Kansas			
Braidwood		215	
COLORADO & WYOMING: UNION PACIFIC From Nebraska			
Farley(AL)		157	
Arkansas(AR)		252	
Millstone(CT)		524	
Hatch(GA)		197	
Vogtle(GA)		431	
Arnold(IA)		158	
Braidwood(IL)		215	
Byron(IL)		244	
Clinton(IL)		200	
Quad Cities(IL)		419	
Zion(IL)		250	
Wolf Creek(KS)		106	
River Bend(LA)		101	
Waterford(LA)		91	
Maine Yankee(ME)		60	
Prairie Island(MN)		221	
Brunswick(NC)		321	
Harris(NC)		258	
McGuire(NC)		427	
Seabrook(NH)		83	
Davis-Besse(OH)		71	
Perry(OH)		82	
Beaver Valley(PA)		160	
Limerick(PA)		497	
Susquehanna(PA)		219	
Three Mile Island(PA)		113	
Catawba(SC)		253	
Robinson(SC)		97	
Summer(SC)		82	
DOE-Savannah River(SC)		1739	
Sequoyah(TN)		161	
Watts Bar(TN)		121	
South Texas(TX)		358	
North Anna(VA)		167	
Corridor Subtotal		8835	

TABLE 4						
YMDEIS TRANSPORTATION IMPACTS						
TRUCK SHIPMENTS THROUGH COLORADO ON I-70						
NEVADA CURRENT CAPABILITIES SCENARIO, DOE MODULE 2						
NEVADA BASE CASE ROUTING						
Browns Ferry(AL)			2067			
Crystal River(FL)			442			
St. Lucie(FL)			1086			
Turkey Point(FL)			871			
Calvert Cliffs(MD)			1140			
Callaway(MO)			735			
Oyster Creek(NJ)			519			
Salem/Hope Creek(NJ)			1992			
Peach Bottom(PA)			1408			
Oconee(SC)			1500			
Surry (VA)			902			
Corridor Subtotal			12662			

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FIGURE 1

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